

:NCGRPDRATED What Better feels like."

August 25, 2005

INTEGRATIVE THERAPEUTICS INC.

NF Formulas * PhytoPharmica Tyler Encapsulations & Vitaline Formulas

9755 SW Commerce Circle, Suite B2 Wilsonville, OR 97070 P: 503.582.8386 • 17 50375802.0465

TOPHARMICA

825 Challenger Drive, Green Bay, WI 54311-8328 P: 920.469.1313 * F: 888.570.6460 (Enzymatic) SFP P7920.469.9099 * F: 920.469.4418 (Phyto)

Office of Nutritional Products, Labeling & Dietary Supplements, HFS 810 Center for Food Safety and Applied Nutrition Food and Drug Administration 5100 Paint Branch Parkway College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

PRODUCT NAME	<u>STATEMENTS</u>	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Holy Basil Trinity Blend™	Naturally elevates your mood*	Unique Trinity Blend: Holy Basil (ocimum sanctum) (leaf) Extract, Holy Basil (ocimum sanctum) (leaf), Supercritical Extract, Holy Basil (ocimum sanctum) (leaf), Steam Distilled Extract

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By:

Robert Doster

Title: Senior Vice President of Scientific Affairs

8/25/05 Date:

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Michael P. Devereux Chief Financial Officer

975 0162

LET 16676



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PRODUCT NAME	<u>STATEMENTS</u>	INGREDIENT(S)TO WHICH THE CLAIM REFERS
Holy Basil Trinity Blend™	Enhances your ability to handle stress.*	UniqueTrinity Blend: Holy Basil (ocimum sanctum) (leaf) Extract, Holy Basil (ocimum sanctum) (leaf), Supercritical Extract, Holy Basil (ocimum sanctum) (leaf), Steam Distilled Extract

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

KIRCILL

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/25/05

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PRODUCT NAME	<u>STATEMENTS</u>	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Holy Basil Trinity Blend TM	For a safe, natural solution to help you cope with everyday stresses, trust Holy Basil Trinity Blend.*	Unique Trinity Blend: Holy Basil (ocimum sanctum) (leaf) Extract, Holy Basil (ocimum sanctum) (leaf), Supercritical Extract, Holy Basil (ocimum sanctum) (leaf), Steam Distilled Extract

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: RUCUŁ

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/25/05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely.



INCORPORATED

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PHYTOPHARMICA'

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PRODUCT NAME	<u>STATEMENTS</u>	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Holy Basil Trinity	This unique three-blend offers up	Unique Trinity Blend: Holy Basil (ocimum
Blend TM	to 3 times the levels of key active	sanctum) (leaf) Extract, Holy Basil (ocimum
	components found in Holy Basil	sanctum) (leaf), Supercritical Extract, Holy
	to deliver optimum support for	Basil (ocimum sanctum) (leaf), Steam Distilled
	stress and nervous irritability.*	Extract

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

Robert Doster

Title: Senior Vice President of Scientific Affairs

8/26/05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Michael P. Devereux



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PRODUCT NAME	<u>STATEMENTS</u>	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Holy Basil Trinity Blend™	Naturally uplifts your mood and spirit.*	Unique Trinity Blend: Holy Basil (ocimum sanctum) (leaf) Extract, Holy Basil (ocimum sanctum) (leaf), Supercritical Extract, Holy Basil (ocimum sanctum) (leaf), Steam Distilled Extract

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By:

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date:

8/26/05

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PRODUCT NAME	<u>STATEMENTS</u>	INGREDIENT(S)TO WHICH THE CLAIM REFERS
Holy Basil Trinity Blend TM	Creates a positive, natural response to stress.*	Unique Trinity Blend: Holy Basil (ocimum sanctum) (leaf) Extract, Holy Basil (ocimum sanctum) (leaf), Supercritical Extract, Holy Basil (ocimum sanctum) (leaf), Steam Distilled Extract

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By:

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date

8/24/05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely.

Michael P. Devereux



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PRODUCT NAME	<u>STATEMENTS</u>	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Holy Basil Trinity	Helps you adapt to stress with	Unique Trinity Blend: Holy Basil (ocimum
Blend TM	ease.*	sanctum) (leaf) Extract, Holy Basil (ocimum
		sanctum) (leaf), Supercritical Extract, Holy
		Basil (ocimum sanctum) (leaf), Steam Distilled
		Extract

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By:

1 1 2

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date:

8/27/05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Michael P. Devereux Chief Financial Officer

Basil Trinity Blend 7e



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
, ,	Holy Basil Trinity Blend uplifts vour spirits.*	UniqueTrinity Blend: Holy Basil (ocimum sanctum) (leaf) Extract, Holy Basil (ocimum sanctum) (leaf), Supercritical Extract, Holy Basil (ocimum sanctum) (leaf), Steam Distilled Extract

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By: KIRILL

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/27/05

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PRODUCT NAME	<u>STATEMENTS</u>	INGREDIENT/S)TO WHICH THE CLAIM REFERS
Holy Basil Trinity	More power to cope with	Unique Trinity Blend: Holy Basil (ocimum
Blend TM	everyday stresses.*	sanctum) (leaf) Extract, Holy Basil (ocimum
		sanctum) (leaf), Supercritical Extract, Holy
	,	Basil (ocimum sanctum) (leaf), Steam Distilled
	,	Extract

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By: FUILL

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/27/05

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Date: 8/27/05

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